

Regarding RM-10620, I feel the proposed rule changes are not in the best interest of the Amateur Radio service and I urge you to dismiss this proposal in it's entirety. The time that a person has been licensed is not a reliable indication of their technical knowledge or ability. There are many individuals who maintain their license although they are not active on the amateur bands. It is therefore impossible to conclude that a person has demonstrated any technical competence at all based solely on the length of time they have been licensed.

If a Novice or Technician class licensee does not wish to take the initiative to advance in the Amateur Service, it does not seem appropriate that they should be given a higher class license due to inaction on their part. Even if an upgrade has to be requested, they will still be rewarded for not attempting to advance.

The licensing requirements have already been significantly eased over the past few years, and anyone who has the desire to advance can do so with the current licensing requirements. If possible, it would be good to determine how many individuals would advance under this proposal that have been unable to pass the tests for the class this proposal would advance them to. I don't know if the VECs keep this type of data, and doubt that they do, but it seems this would be an important prerequisite to considering this proposal, since there will certainly be some number of individuals that will advance that have already demonstrated that they don't have the technical competence currently required to advance by their failure to pass the existing examinations.

Thank you for your time and consideration,

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